

October 9th, 2015

Victoria Wachino, Director
Center for Medicaid and CHIP Services
Centers for Medicaid and Medicaid Services
200 Independence Avenue, Southwest
Washington, DC 20201

Dear Ms. Wachino:

Re: Washington State Application for Global Medicaid Waiver

On behalf of Providence Health & Services, I want to thank you for the opportunity to provide comments on Washington state's application for a global 1115 Medicaid waiver. We see this potential waiver as a critical piece to implementing innovative strategies that will contribute to the health and well-being of Washington's citizens over the long-term, and therefore submit our support with the following comments.

Providence Health & Services is a not-for-profit Catholic health care ministry committed to providing for the needs of the communities it serves – especially for those who are poor and vulnerable. Providence and its affiliates employ 73,000 people across five states – Washington, Oregon, Alaska, California and Montana – with a system office located in Renton, Washington.

In Washington state, Providence and its secular affiliates – including Swedish Health Services and Kadlec – comprise 15 hospitals, 268 physician clinics, senior services, supportive housing, hospice and home health programs, care centers and diverse community services. The combined health system is the largest health care provider in Washington and employs more than 32,000 people statewide. In 2013, Providence and Swedish provided \$413 million in community benefit, including \$118 million in free and discounted care¹ for Washingtonians who could not afford to pay. Together, we are working to improve quality, increase access and reduce the cost of care in all of the communities we serve.

Upon reviewing Washington's proposed 1115 Medicaid Transformation Waiver, we offer our support of the intent of Washington's application. We believe that a global Medicaid waiver represents an incredible opportunity for true transformation of care within our state, especially for those vulnerable citizens with complex health needs that could be better served through wrap-around approaches to care. While we know there are many details yet to be determined, the state's particular focus on how Washington's health care system can better meet the needs of the poor and vulnerable is especially aligned with our mission as an organization, and we appreciate the attention to special populations such as homeless individuals and those needing long-term supports and services throughout the application.

¹ Community benefit and charity care data is consolidated based on financial reporting.

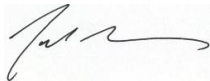
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This support is submitted on behalf of Providence Health & Services including its affiliates Swedish Health Services, Pacific Medical Centers (PacMed), and Kadlec, Providence Health Plan (a registered health care service contractor) and the Providence-Swedish Health Alliance as our Accountable Care Organization. Because of the wide range of services included in our organization, such as long-term care services and our PACE (Program for All-Inclusive Care for the Elderly) implementation in addition to our hospitals and clinics, we believe we have a unique perspective on health care transformation and the complexities of large-scale implementation of specific initiatives, and we look forward to being an engaged partner with the Health Care Authority as they undertake decision-making processes to implement health care transformation activities, including this potential waiver.

Again, we thank you for the opportunity to provide our comments on Washington's application. For more information, please contact Lauren Platt, state advocacy program manager, at (425) 525-5734 or via e-mail at lauren.platt@providence.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Joel', followed by a long, horizontal, wavy line that extends to the right.

Joel Gilbertson
Senior Vice President, Community Partnerships and External Affairs
Providence Health & Services